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January 18, 2022

VIA ECF

Hon. Margo K. Brodie
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room N 626
Brooklyn, NY 11201

Re: Klimovitsky v. JG Innovative Industries, Inc., et al.
Case No. 21-CV-755 (MKB)(RER)

Dear Judge Brodie:

This firm represents the defendants in the above-referenced action. I write in response to the plaintiff's January 10th letter to the Court, which requests permission to file the plaintiff's proposed second amended complaint, attached thereto.

Although the defendants will not oppose the plaintiff's request for permission to file the proposed second amended complaint at this time, the defendants expressly reserve all rights with respect to the proposed second amended complaint, including the right to assert any and all possible defenses thereto and to move for the dismissal of such second amended complaint on any and all possible grounds should the Court grant the plaintiff permission to file it.

Respectfully Submitted,

/s/Nils C. Shillito

Nils C. Shillito (NS-6755)

cc: Shalom Law, PLLC (via ecf)